

# Exhibit W

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**Attorneys for Defendant**

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**

**UNITED STATES OF AMERICA,**  
  
**Plaintiff,**  
  
**v.**  
  
**PIROUZ SEDAGHATY,**  
  
**Defendant.**

**CR 05-60008 HO**

**DEFENDANT'S FOURTH**  
**AMENDED POTENTIAL EXHIBIT**  
**LIST**

Defendant, Pirouz Sedaghaty, by and through his attorneys, Lawrence Matasar and Federal Public Defender Steven T. Wax, hereby submits the following Fourth Amended List of Potential Exhibits.

<b>Trial Ex. #</b>	<b>Exhibit Description</b>
0601	Constitution of Al Haramain Islamic Foundation (Saudi Arabia)
0602	Monthly report and statement of purpose (PF)
0602(A)	Monthly Report and Statement of Purpose Declaration of Cooperation Statement between Qu'ran Foundation and Al Haramain Foundation March 6, 1998
0602(B)	Signed Statement of Purpose Declaration of Cooperation Statement between Qu'ran Foundation and Al Haramain Foundation
0602(C)	Statement of Purpose and Declaration of Cooperation between Qu'ran Foundation and Al Haramain Islamic Foundation with printed signatures Solimon Al Buthe, Abu Unus, Dawood Rodgers, and Robert L. Brown
0603	Letter March 31, 1998, Qu'ran Foundation to Al Haramain Foundation
0604-0605	Reserved
0606	Email January 1, 2000, 2:37 p.m. P to Al Buthe
0607	Photograph Pete Seda and Solomon Al Buthe under tree
0608	Photograph Pete Seda, Rob Brown, John Dunn and David Rodgers
0609	Photograph including Rob Brown, David Rodgers, and Pete Seda

- |           |   |
|-----------|---|
| 0610      | Photograph of 3800 S Highway 99 with camel  |
| 0611      | Photograph of cultural tent at 3800 South Highway 99  |
| 0612      | Photograph Al Haramain building   |
| 0613      | Photograph of David Rodgers with King Abdullah  |
| 0614      | Email June 26, 2000 AQ to b@qf.org on his trip - and extremism  |
| 0614(A)   | Attachment to June 26 2000 email June 25, 2000 Al Buthe to AQ   |
| 0615-0627 | Reserved  |
| 0628      | December 2, 1999, article from NY TIMES "McCain Urges Ending Aid To Russia In Wake Of Chechen Policy"   |
| 0629      | ABC News.com page, December 9, 1999, "Yeltsin Lashes Out"   |
| 0630      | THE INDEPENDENT web page December 11, 1999, "In A Powerless, Frozen City Of No Food, The Blind Hear The Bombs And Know There Is No Escape; Sarah Richards Toured Chechnya's Capital As Russian Forces Closed In, And Was Among The Last To Leave." <b>[replaced with different version]</b> |
| 0631      | TIME webpage December 13, 1999, "Campaign 2000: Foreign Policy: Where McCain Hits Bush The Hardest"   |
| 0632      | Doctors Without Borders webpage December 15, 1999, "Chechnya: The Tracking of Civilians"  |
| 0633      | CNN.com webpage December 16, 1999, "Albright Delivering 'strong message' to Russia"   |
| 0634      | Email December 29, 1999 at 5:20 a.m., Raya Shokatfard to <a href="mailto:lz@qf.org">lz@qf.org</a> , with CNN.com webpage December 18, 1999, "Russian Bombardment Intensifies As Troops Close On Grozny" <b>[replaced with a complete version]</b>   |

- 0635            Webpage The Gazette, February 6, 2000, "Escape From Chechnya" **[replaced with different version]**
- 0636            Reserved
- 0637            Email February 17, 2000 at 1:02 a.m., Q to AQ with CNN webpage February 16, 2000, "NATO, Russian Relax Tense Relations" **[replaced with a complete version]**
- 0638            Reserved
- 0639            Article Ria Novosti February 28, 2000, "Saudi Arabia to Provide Humanitarian Aid For Refugees"
- 0640            Human Rights Watch Report February 29, 2000, "War Crimes In Chechnya And The Response Of The West"
- 0641            Email February 21, 2000 at 11:34 p.m. The Arborist to b at qf.org with CNN.com February 21, 2000 Russia Chechnya webpage **[replaced with a complete version]**
- 0642            CNN.com Website Pages March 22-31, 2000
- 0643            UN Commission on Human Rights Resolution of April 25, 2000
- 0643(A)        United Nations Foundation U.N. wire April 26, 2000, "U.N. Seeks Inquiry Into Violations In Chechnya"
- 0644            MSF-USA special report, November 22, 2000, Chechnya, The Politics Of Terror
- 0645            United Nations High Commissioner for Human Rights Resolution 2001/24
- 0646            U.S. Senate Committee on Foreign Relations, Joseph R. Biden, February 12, 2004
- 0647            State Department Russia Country Report 1999
- 0648            State Department Russia Country Report 2000

- 0649 State Department Russia Country Report 2001
- 0650 NY Times 10/30/99 "Fears Rise for Chechen Refugees as Winter Nears"
- 0651 Reserved
- 0652 Congressional Research Service Report for Congress: Chechnya Conflict: Recent developments (May 3, 2000)
- 0653 News article U.S.: Chechen Officials Hold Talks at State Department (February 2, 2000)
- 0654 Time.com News Article, Why Russia May Keep Chechen Capital in Ruins (February 7, 2000)
- 0656-0663 Reserved
- 0664 Email September 18, 2001 from Florin to Pete Seda plus attachment
- 0664(A) September 21, 2001, 9:25 a.m. P to Council of American Islamic Relations plus attachment
- 0665 Email September 21, 2001, 9:33 a.m. P to CIC@cicnow.com
- 0666 - 0667 Reserved
- 0668 Bank of America Check and traveler's check purchase
- 0669 Email January 11, 2000, 14:38:08 S. El Fiki to Haramain
- 0670 Email January 18, 2000, Haramain to S. El Fiki
- 0671 Email February 21, 2000, 9:12 a.m. head office to S. El Fiki
- 0672 February 21, 2000, Letter Aqeel to S. El Fiki
- 0673 February 14, 2000, Fax S. El Fiki to Nasir Eid National Bank of Kuwait

- 0673(A) English translation of February 14, 2000, Fax S. El Fiki to Nasir Eid National Bank of Kuwait
- 0673(B) Declaration of Translation of February 14, 2000, Fax S. El Fiki to Nasir Eid National Bank of Kuwait
- 0674 Email February 24, 2000 P to Al Buthe RE money transferred
- 0675 Reserved
- 0676 Email March 27, 2000, 8:36 a.m. Al Haramain to S. El Fiki
- 0677 Letter April 13, 2000, Mahmoud T. El Fiki from National Bank of Kuwait
- 0678 Redacted Federal Bureau of Investigation 302 interview report of Mahmoud Talaat El Fiki, investigation on January 31, 2005
- 0679 Kuwait Bank record for El Fiki
- 0680 Email May 11, 1999 Barhoush to Haramain et al Subject: Urgent Albanian Translation
- 0680(A) Email Abdul Qaadir to Haramain May 11, 1999 Report of Committee on Albania
- 0681 Email December 11, 1999, Abdul Qaadir to Qur'an and Sunnah Net Group; Jeddah-Net@muslimsonline.com
- 0682 Email December 28, 1999, 4:26 p.m. from Info to Info@irw.org
- 0683 Email December 30, 1999, 8:50 p.m. P to Al Buthe
- 0683(A) Attachment to email Statement in Spanish and English from Ayuda Internacional Al Desplazado
- 0683(B) Email from Al Buthe to P December 31, 1999 Human Help for Chechnya

0683(C) Email January 1, 2000 1:46 P to Al Buthe RE Horrible Condition

0683(D) Email from Al Buthe to P, January 2, 2000 at 4:58 AM

0684 Email from Head Office to Bilal Ibrahim with cc to Pete, January 3, 2000 at 3:10 AM

0685 Email from Abdul-Qaadir to q@qf.org, January 4, 2000 at 1:00 AM

0685(A) Email attachment January 4, 2000 at 1:00 AM

0686 Email January 6, 2000, 1:35 a.m. Al Buthe to P

0686(A) Email January 6, 2000, 1:37 a.m. Al Buthe to P

0686(B) Email January 7, 2000, 3:48 p.m. Info to Info@irw.org

0686(C) Email January 12, 2000, 5:43 p.m. Info to Info@irw.org

0687 Email Daveed Gartenstein-Ross to P January 17, 2000

0687(A) Email P to Daveed Gartenstein-Ross January 17, 2000

0687(B) Email Chain P to B February 21, 2000, including Daveed Gartenstein-Ross to P 1/17/2000 RE Horrible Condition and P to Al Buthe 1/1/2000 RE Horrible Condition

0687(C) Email P to Daveed Gartenstein-Ross January 18, 2000 plus attachment

0687(D) Email P to Daveed Gartenstein-Ross January 18, 2000

0688 Email Ashland to Al Buthe January 18, 2000

0688(A) Email January 22, 2000, 11:23 p.m. Ashland to Al Buthe

0689 Letter January 24, 2000, Pete Seda to Responsible Secretariat of Federation Committee for International Technical Humanitarian Cooperation



0689(A) Email January 27, 2000, 10:08 a.m. Info to Info@irw.org

0690 Email AQ to Sheeshan February 3, 2000

0691 Email P to Daveed Gartenstein-Ross February 4, 2000

0691(A) Email P to Daveed Gartenstein-Ross February 8, 2000

0692 Email Q to AQ February 12, 2000

0692(A) Email from Q to Sunnah, February 12, 2000, with path to Time.com, Photo Essay RE: Grozny

0692(B) Photographs Time.com photo essay, Russian Soldiers Rest in Downtown Grozny

0692(C) Blinded and Bound, Chechen Civilians

0692(D) Chechen Men in Pit

0692(E) Chechen Boy in Cellar

0692(F) Chechen Woman with Son

0692(G) Fallen City

0693 Email P to Al Buthe February 15, 2000

0693(A) Email The Arborist to Al Buthe February 17, 2000

0693(B) Email P to B February 19, 2000

0693(C) Email P to Al Haramain February 20, 2000

0694 Email February 20, 2000 The Arborist to b@qf.org

0694(A) Email P to MCA February 21, 2000 11:40

0694(B) Email February 21, 2000, 11:34 p.m. from The Arborist to B@qf.org

- 0694(C) Email February 21, 2000, 10:54 a.m. The Arborist to B@qf.org
- 0694(D) Email February 21, 2000 5:48 p.m. The Arborist to B  
**[replaced with different version]**
- 0694(E) Web page Medecins Sans Frontieres
- 0694(F) Web page United Nations
- 0695 Email Chain P to B February 21, 2000 including P to Daveed Gartenstein-Ross 2/19/2000 and Daveed Gartenstein-Ross to P 2/8/2000 RE: Chechnya
- 0696 Email AQ to Sheeshaan February 23, 2000
- 0697 Email February 29, 2000, 12:16 p.m. P to B@qf.org
- 0697(A) Email Q to PJFlorin February 29, 2000
- 0697(B) Email P to B March 1, 2000
- 0698 Memorandum March 1, 2000, Catherine Granel from Bilal Abdul-Kareem, "Aid to the People of Chechnya"
- 0698(A) Email Q to Granel March 1, 2000 with Memo to Bilal
- 0698(B) Web Page Doctors of the World Staff 2000
- 0698(C) Email March 1, 2000, 10:55 a.m. Q to P@qf.org
- 0698(D) Email March 1, 2000, 11:29 a.m. P to PJFlorin@jeffnet.org
- 0698(E) Letter March 1, 2000 Bilal to Catherine Granel RE: Aid to the people of Chechnya
- 0698(F) Email March 1, 2000 P to Q RE: Letter to Doctors
- 0698(G) Letter Attachment to March 1, 2000 email Subject: Aid to the People of Chechnya
- 0698(H) Email Q to The Arborist March 3, 2000

0699 Email P to Al Buthe March 3, 2000

0699(A) Email March 4, 2000 p to q@qf.org

0699(B) Attachment to Email March 4, 2000

0700 Email March 5, 2000 P to b@qf.org FW: I need your help!

700(A) Web printout, World Food Program, Azerbaijan, printed February 29, 2000

700(B) Web printout, World Food Program Delivers - The Balkans, printed February 29, 2000

700(C) Web printout, World Food Program Bread Story - Kosovo, printed February 29, 2000

700(D) Web printout, World Food Program Logistics Photo Gallery, picture of airplane dropping food, printed March 1, 2000

700(E) Web printout, World Food Program Logistics Photo Gallery, picture of helicopter, printed March 1, 2000

700(F) Web printout, World Food Program Logistics Photo Gallery, picture of truck convoy, printed March 1, 2000

700(G) Web printout, World Food Program Logistics Photo Gallery, picture of loaded truck, printed March 1, 2000

0701 Email March 15, 2000 from Info to Harith RE Eid Mubarak

0701(A) April 2, 2001, 9:58 a.m. CIC@cicnow.com

0702 - 0703 Reserved

0704(A) Al Haramain Islamic Foundation receipt No. 262740

0704(B) English translation of Al Haramain Islamic Foundation receipt No. 262740

0705(A) Al Haramain receipt no. 263867

- 0705(B) English translation of Al Haramain receipt no. 263867
- 0706(A) Al Haramain log page of receipts no. 262740 & 263867
- 0706(B) English translation of Al Haramain log page of receipts no. 262740 & 263867
- 0707(A) Affidavit of Al Haramain Islamic Foundation, executed May 3, 2004
- 0707(B) Certificate of translation of Affidavit of Al Haramain Islamic Foundation, executed May 3, 2004
- 0707(C) English translation of Certificate of translation of Affidavit of Al Haramain Islamic Foundation, executed May 3, 2004
- 0708 - 0712 Reserved
- 0713 Al Suwailem Declaration
- 0714(A) Diwan Presidency of Counsel of Ministers
- 0714(B) English translation of Diwan Presidency of Counsel of Ministers
- 0715(A) Diwan memo to His Royal Highness Minister of Interior re: Chechen Relief and SJRC
- 0715(B) English translation of Diwan memo to His Royal Highness Minister of Interior re: Chechen Relief and SJRC
- 0716(A) Kingdom of Saudi Arabia, Saudi Joint Relief Committee (SJRC) for the Aid of the People of Kosovo
- 0716(B) English translation of Kingdom of Saudi Arabia, Saudi Joint Relief Committee (SJRC) for the Aid of the People of Kosovo
- 0717(A) Memo to His Excellency Minister of Finance and National Economy

- 0717(B) English translation of Memo to His Excellency Minister of Finance and National Economy
- 0718(A) Order of King Fahad Bin Abdulaziz Al-Saud
- 0718(B) English translation of Order of King Fahad Bin Abdulaziz Al-Saud
- 0719(A) Al Haramain Humanitarian Foundation memorandum November 4, 1999
- 0719(B) English translation of Al Haramain Humanitarian Foundation memorandum November 4, 1999
- 0720(A) Telegram to the Minister of the Interior, re: Saudi Joint Committee November 10, 1999
- 0720(B) English translation of Telegram to the Minister of the Interior, re: Saudi Joint Committee November 10, 1999
- 0721(A) Minutes of meeting of the Chechnya Committee/Saudi Joint Relief Committee January 1, 2000
- 0721(B) English translation of Minutes of meeting of the Chechnya Committee/Saudi Joint Relief Committee January 1, 2000
- 0722(A) Memo from Al Haramain Charity Foundation January 4, 2000
- 0722(B) English translation of memo from Al Haramain Charity Foundation January 4, 2000
- 0723(A) Report of Saudi Joint Relief Committee for Kosovo and Chechnya (Chechnya Committee) February 15, 2000
- 0723(B) English translation of Report of Saudi Joint Relief Committee for Kosovo and Chechnya (Chechnya Committee) February 15, 2000
- 0724(A) Brief report what Chechnya Committee has achieved abroad

- 0724(B) English translation of brief report what Chechnya Committee has achieved abroad
- 0725(A) Declaration of Vladimir Matusevitch August 23, 2004
- 0725(B) Accord between Russian Ministry and Saudi Joint Relief Committee for Kosovo and Chechnya in Russian and Arabic
- 0725(C) English translation from Arabic of Memo of Accord between Russian Ministry and Saudi Joint Relief Committee for Kosovo and Chechnya
- 0725(D) English translation from Russian of Russian and Arabic language version of Accord between Russian Ministry and Saudi Joint Relief Committee for Kosovo and Chechnya
- 0725(E) Russian language version of Certificate 9927 of the State Registration Chamber
- 0725(F) English translation of Certificate 9927 of the State Registration Chamber
- 0726(A) Telegram regarding Al Haramain, Chechnya and Saudi Joint Relief Committee June 2, 2003
- 0726(B) English translation of Telegram regarding Al Haramain, Chechnya and Saudi Joint Relief Committee June 2, 2003
- 0727(A) Telegram to Al Rajhi Banking and Investment Corporation March 14, 2004
- 0727(B) English translation of Telegram to Al Rajhi Banking and Investment Corporation March 14, 2004
- 0728(A) Confirmation from Minister of Justice regarding Al Haramain Islamic Foundation March 21, 2004
- 0728(B) English translation of Confirmation from Minister of Justice regarding Al Haramain Islamic Foundation March 21, 2004
- 0729(A) Statement from Al Haramain Charity Foundation May 3, 2004

0729(B)	English translation of Statement from Al Haramain Charity Foundation May 3, 2004
0730	Unclassified summary regarding monies destined for needy Chechen families
0731	Al Haramain Website list of Al Haramain bank accounts
0732 - 0747	Reserved
0748	Handwritten document captioned "Wire Transfer" top line \$2767
0749(A)	Email December 30, 1999 8:20 a.m. Tom to Pete Seda
0749(B)	Proposal attachment to email: Letter Tom Wilcox to Pete Seda December 30, 1999
0750	Engagement letter from Tom Wilcox to Pete Seda
0751	Handwritten list, top line 2/24/2000 Mahmoud T. El Fiki
0752	Check #9733 June 23, 2000
0753	Check #9733 6/23/2000
754.42318	2000 Form 990
754.42335	2000 State CT-12 Return
754.42477	2001 Form 990
754.42494	2001 State CT-12 Return
754.42532	Letter from Internal Revenue Service to Al Haramain dated September 2, 2002
754.42533	Letter from Internal Revenue Service to Al Haramain dated February 20, 2002
754.42540	Letter from OR DOJ to Al Haramain dated October 30, 2001

754.42659	Letter from OR DOJ to Al Haramain dated June 19, 2001
754.42703	Letter from OR Dept of Revenue to Al Haramain dated August 8, 2000
754.42810	Letter from Internal Revenue Service to Al Haramain dated May 31, 2002
754.42895	Letter from OR DOJ to Al Haramain dated February 22, 2001
754.42896	1999 Form 990
754.43005	1998 Corporate Return Form 1120
754.43014	Oregon Corporation excise tax return 1998
754.43075	Letter from Internal Revenue Service to Al Haramain dated December 7, 2000
754.43104	Letter from Internal Revenue Service to Al Haramain dated October 13, 2000
754.43111	Letter from Tom Wilcox to OR DOJ dated September 22, 2000
754.43112	Letter from OR DOJ to Al Haramain dated September 7, 2000
754.43127	Letter from Tom Wilcox to Internal Revenue Service dated September 25, 2000
754.43129	Letter from Internal Revenue Service to Al Haramain dated September 6, 2000
754.43156	Letter from Tom Wilcox to Internal Revenue Service dated August 17, 2000
754.43158	Letter from Internal Revenue Service to Al Haramain dated March 24, 2000
754.43193	1023 Application



754.43219 Letter from OR DOJ to Al Haramain dated January 14, 2004

754.43220 Letter from Internal Revenue Service to Al Haramain dated February 9, 2004

754.43238 Letter from Internal Revenue Service to Al Haramain dated March 16, 2000

754.43252 Letter from OR DOJ to Al Haramain dated July 26, 2000

754.43257 Letter from OR DOJ to Al Haramain dated April 11, 2000

754.43337 Letter from Internal Revenue Service to Al Haramain dated December 22, 2003

754.43340 Letter from OR DOJ to Al Haramain dated November 21, 2003

754.43341 Letter from OR DOJ to Al Haramain dated October 16, 2003

754.43356 Letter from OR DOJ to Al Haramain dated June 4, 2003

754.43360 Letter from OR DOJ to Al Haramain dated April 4, 2001

754.43411 Letter from OR DOJ to Al Haramain dated October 30, 2000

754.43433 Letter from Tom Wilcox to Internal Revenue Service dated January 3, 2002

754.43434 Letter from Internal Revenue Service to Al Haramain dated December 31, 2001

754.43437 Letter from Tom Wilcox to Internal Revenue Service dated October 2, 2001

754.43438 Letter from Internal Revenue Service to Al Haramain dated September 24, 2001

754.43447 Letter from OR DOJ to Al Haramain dated August 24, 2001

754.43459	1999 State CT-12 Return
754.43462	Letter from Tom Wilcox to OR DOJ dated January 8, 2001
754.43487	Letter from Internal Revenue Service to Al Haramain dated February 4, 2000
754.43512	Letter from Internal Revenue Service to Al Haramain dated June 1, 2000
754.43660	Letter from Internal Revenue Service to Al Haramain dated April 18, 2001
755.1	Email from P to Tom Wilcox, May 14, 2001
755.2	Attachment to 755.1 - QuickBooks File
755.3	Floppy Disk from Tom Wilcox, Labeled "Al Haramain 6/14/2001"
755.4	QuickBooks file located on 755.3
755.5	Email January 7, 2002 from Tom Wilcox to P
755.6	Attachment to 755.5 - QuickBooks File
755.7	Jeff Cone, Audit Trail, January 1999 through December 2003 <b>[first page has been redacted]</b>
755.8	Jeff Cone, Financial Statement Transactions: QuickBooks Audit Report Emulation
755.9	Email March 13, 2001 from Tom Wilcox to Pete Sedda
755.10	Attachment to 755.9 - QuickBooks File
755.11	Email June 12, 2001 from P to Shoumar, Abdulaziz S (rrd)
755.12	Attachment to 755.11 - QuickBooks File
755.13	September 19 - 24 Wilcox Data Entry Report

0756	Email January 2, 2000, 1:13 p.m. P to Ms. Katkhouda
0757-0758	Reserved
0759	Email February 26, 2000, 12:45 a.m. from Al Buthe to P@qf.org
0760	Email March 6, 2000 Al Shoumar to q@qf.org
0760(A)	Attachment to Email March 6, 2000 Al Shoumar to q@qf.org
0761	Email from Q to P March 7, 2000, Six months budget with attachment
0762	Email from P to Shoumar January 3, 2001 RE springfield@Al Haramain.org
0763-0800	Reserved
0801	Email April 1, 2000, 3:07 p.m. P to Raya Shokatford
0802	Letter Proposal April 11, 2000, Pete Seda
0803(A)	Email April 12, 2000, 11:57 a.m. PJFlorin@jeffnet.org to Pete Seda
0803(B)	Draft greetings letter.doc attached to email
0803(C)	Draft public relations letter re Islam attached to email
0803(D)	Draft Greeting Letter (PF)
0803(E)	Draft greeting letter (short version) PF
0803(F)	Letter April 11, 2000 Public relation plan (PF)
0804(A)	Email April 18, 2000, 3:05 p.m. PJFlorin @jeffnet,org to Pete Seda
0804(B)	Draft Jewish Community letter attached

0804(C) Draft anti-terrorism letter to Sheik Aqeel attached to April 11, 2000, email

0804(D) Letter to April 18, 2000 to Rabbi Zaslow (PF)

0804(E) Letter April 18, 2000 to Rabbi Sirinski (PF)

0805(A) Email April 19, 2000 12:46 a.m. Ashland to Al Buthe

0805(B) Attachment to email, Letter April 19, 2000, Pete Seda to Aqeel al Aqeel

0806 Letter April 19, 2000, Pete Seda to Aqeel al Aqeel

0807 Email July 5, 2000, 11:52 a.m. PJFlorin@jeffnet.org to Pete Seda plus attachment

0807(A) Draft letter to Shiukh (PF)

0808 ASHLAND DAILY TIDINGS September 15, 2001

0809 Letter September 18, 2001, Al Haramain Foundation, signed by Pete Seda, to Office of Emergency Relief, City of New York

0809(A) Letter September 18, 2001 to NYC (PF)

0810 Letter September 18, 2001, Pete Seda to State Department

0810(A) Draft September 2001 Justice for All (PF)

0810(B) Draft September 2001 Justice for All (PF)

0811 Letter September 18, 2001, Pete Seda to Office of Emergency Relief

0812 Letter September 20, 2001, Pete Seda to My Dear Brothers and Sisters, Call for Islamic Outreach

0812(A) Call For Islamic Outreach (PF)

0813 Letter to State Department 9/18/2001 (PF)

0813(A) Letter September 20, 2001, Secretary of Health and Human Services, Tommy Thompson, from Pete Seda

0814 Mail Tribune article, September 20, 2001

0815 Letter to the Editor by Pete Seda

0815(A) Press Release "From The Muslim Heart" (PF)

0816 Email September 21, 2001, 9:15 p.m. Marisa Petersen to Qur'an Foundation

0817 Email September 23, 2001, 10:59 a.m. A to letters@tucsoncitizen.com

0818 Email September 23, 2001, 6:45 p.m. A to Oelrichs@rockymountainnews.com

0819 Email September 23, 2001, 7:31 p.m. A to letters@washpost.com

0820(A) Email September 26, 2001, 11:04 a.m. Florin to Pete Seda

0820(B) Letter September 26, 2001, Pete Seda to Senator Wyden

0820(C) Letter Form: Educational Outreach Services (PF)

0821 Letter October 2, 2001, Congressman Greg Walden to Pete Seda

0822 Letter October 2, 2001, Pete Seda to Dear Spiritual Leader

0823 Letter October 5, 2001, Federal Bureau of Investigation Thomas J. Pickard to Pete Seda

0824 Email October 7, 2001, 2:28 p.m. The Arborist to Traci Dow

0825 Email October 7, 2001, 3:05 p.m. A to DBerger and attachment

- 0826 Email October 14, 2001, 1:16 p.m. Scarlet Ledesma to Pete@TheArborist.com
- 0827 Reserved
- 0828 Letter October 24, 2001, Department of the Army, Office of Chief of Chaplins, to Pete Seda
- 0829 Letter November 19, 2001, Federal Bureau of Investigation to Pete Seda
- 0830 Email November 27, 2001 2:57 pm, from Peace Hhouse to recipient list
- 0831 Email November 28, 2001 7:58 am, Victoria Lane to P
- 0832 Announcement of community benefit concert Saturday, December 1, 2001
- 0833 Press release March 2002
- 0833(A) Press Release - Six Month Anniversary of 9/11 (PF)
- 0834 Email Pete Seda To Pat Florin, March 12, 2002 Al Haramain Press Release (PF) **[replced with different document]**
- 0835 Letter March 15, 2002, Pete Seda to Senator Joseph Biden
- 0835(A) Letter To Biden, March 14, 2002 (PF)
- 0836(A) Email October 14, 2002, from Florin to Pete Seda
- 0836(B) Attachment to Email October 14, 2002, from Florin to Pete Seda
- 0836(C) Letter To Scholars Of The Ummah (PF)
- 0837 Reserved
- 0838 Letter November 4, 2002, Pete Seda to Brothers in Al Haramain Islamic Foundation

- 0839 Letter 10th of Sha'ban 1423 Pete Seda to Scholars of the Ummah
- 0840 Memo January 28, 2003, Secretary of State Powell from Pete Seda
- 0840(A) Letter January 28, 2003 from Pete Seda to Charles Matthews seeking Fatwah on Bin Laden
- 0840(B) Letter To Colin Powell, January 27, 2003 (PF)
- 0840(C) Letter January 28, 2003 Pete Seda to David Carroll RE Islamic legal case against Osama Bin Laden
- 0841 - 0852 Reserved
- 0853 Letter February 14, 2002, United States Department of Justice, Criminal Division, to Pete Seda
- 0854 Letter July 2, 2002, Pete Seda to Dave Carroll
- 0855 Consent 10/3/01 for David Carroll to access Al Haramain Bank Account
- 0856 Photograph Pete Seda with United States UAE Ambassador Michele J. Sison
- 0857 - 0865 Reserved
- 0866 Letter April 22, 2002, Pete Seda to Israeli Embassy
- 0866(A) Email Pat Florin To Pete Seda, Re: Letter re Palestinian Aid (PF), plus attachment
- 0867 Letter April 22, 2002, Pete Seda to Licensing Division, Office of Foreign Assets Control
- 0868(A) Email April 22, 2002, P to Florin 4:43 pm
- 0868(B) Attached letter to Israeli Embassy April 22, 2002
- 0869 Email April 23, 2002 8:19 am, Brett Schor to P

0870 Letter May 2, 2002, Ambassador Kurtzer to Pete Seda

0871 Emails May 13,2002, P.S to Benny Dagin

0872 Letter May 14, 2002, Pete Seda to Lorraine Lanlor, Office of Foreign Assets Control

0873 Letter May 14, 2002, Pete Seda to Compliance Division Office of Foreign Assets Control

0873(A) Letter To Office of Foreign Assets Control, Re: Humanitarian Aid For Palestinians (PF)

0874(A) Email May 28, 2002, 1:25 pm P.S to Florin

0874(B) Letter May 28, 2002, Pete Seda to Earl Wall; attachment to May 28, 2002 letter

0874(C) Letter To Earl Wall, CARE, May 28, 2002 (PF)

0875 Letter June 19, 2002, Office of Foreign Assets Control to Martin McMahon, Esquire

0875(A) Email Pat Florin to P.S, June 20, 2002, Benny Dagan (PF)

0876 Letter July 1, 2002, Pete Seda to Richard Newcomb, Office of Foreign Assets Control

0877(A) Email July 2, 2002, 2:10 pm David Berger to Pete Seda

0877(B) Letter July 2, 2002, Pete Seda to Police Chief Scott Fleuter

0877(C) Letter July 2, 2002, to Lieutenant Patten

0878 Letter July 16, 2002, Pete Seda to Israeli Colonel Isaac Gurvich

0879 Letter July 17, 2002, Pete Seda to Ambassador Kurtzer

0880 Letter July 17, 2002, Pete Seda to United States Embassy, Economics Section, Ava Rogers



- 0881 Letter July 17, 2002, Pete Seda to Deborah Schwartz,  
United States Embassy, Israel
- 0882 Fax July 22, 2002, Ava Rogers, U.S. Embassy to Pete Seda
- 0882(A) Email Pete Seda to Pat Florin, July 22, 2003 With Ava  
Rogers.jpg (PF)
- 0882(B) Attachment to Ex 882(A), "7 22 02 Ava Rogers.jpg" (PF)
- 0883(A) Email July 22, 2002, Florin to P.S 11:24 am
- 0883(B) Letter July 22, 2002, Pete Seda to Ava Rogers, U.S.  
Embassy
- 0883(C) Letter July 22, 2002 Pete Seda to Ava Rogers United States  
Embassy Re: Humanitarian Aid in the West Bank and Gaza  
(PF)
- 0884 Letter July 23, 2002, Pete Seda to Ian Barukh, Israeli  
Foreign Ministry
- 0885 Letter July 26, 2002, Rabbi Zaslow
- 0886(A) Email July 30, 2002, P.S. to David Berger 2:28 p.m.  
**[replaced with different document]**
- 0886(B) Letter Israeli government July 28, 2002
- 0887 Fax July 31, 2002, Leah Tsemel to Pete Seda
- 0888 Letter Pete Seda to Ms. Orley, Israel Defense Forces
- 0889 Email August 27, 2002, Florin to P.S, with email from P.S to  
Florin
- 0890 Stained Peace of My Heart Aug 2002 (PF)
- 0891 - 0905 Reserved
- 0906 Email February 21, 2000, 8:50 p.m.wsra99@aol.com to  
P@qf.org

0907 Email March 29, 2000, 11:32 a.m. P to wsra99@aol.com

0907(A) Email March 30, 2000 P to Al Buthe FW: Agreement

0907(B) Email March 30, 2000 P to Al Buthe FW: Agreement with attachment

0908(A) Email October 26, 2001, 4:48 p.m. Sandra Kay to Pete Seda

0908(B) Attached letter, October 26, 2001, to Steve Monroe at Office of Foreign Assets Control

0909(A) Letter November 1, 2001, Pete Seda to Emily Clay at Office of Foreign Assets Control

0909(B) Letter November 2, 2001, Office of Foreign Assets Control to Pete Seda

0909(C) Letter November 1, 2001 Pete Seda to Emily Clay Office of Foreign Assets Control Application for license to distribute food to Afghani refugees (PF)

0910 Email October 9, 2000 P to Al Buthe RE; Tajikistan

0911 Email October 23, 2001 P to Al Buthe RE make it work out – with attachments

0912 - 0924 Reserved

0925 Photograph Pete Seda with truck

0926 Article REGISTER GUARD, “Fate of Big Leaf Maples in Whiteaker Up In The Air”

0927 Email January 20, 2000, 7:41 p.m. Brad and Rooney Riggs to P

0928 Email February 11, 2000, 6:56 p.m. Jim Hartman to Pete Seda

0929 Ashland Watershed Partnership meeting notes March 28, 2000

0930	Email November 17, 2000, 3:08 p.m.: Swales to @mind.net
0931	Email April 11, 2001, 11:56 a.m. Rose Hill to P@qf.org
0932	Email June 24, 2001, 2:13 p.m. The Arborist to Colonel Swales
0933(A)	Email October 17, 2001, Representative Greg Walden to Pete Seda
0933(B)	Email December 6, 2001, Representative Greg Walden to Pete Seda
0934	Photograph Pete Seda Cleaning Ashland
0935	Photograph Pete Seda On Ladder
0936	Photograph Pete Seda Cleaning with fire people
0937	Photograph The Arborist Crew
0938	Photograph Pete Seda with Governor Kitzhaber
0939	Photograph Pete Seda Cleaning Downtown Ashland
0940-0941	Reserved
0942	Letter To Mayor Cathy Shaw, January 31, 2000 (PF)
0943	Reserved
0944	Hamrick Road Letter, April 20, 2000 (PF)
0945	Reserved
0946	8/8/00 Letter to William Keller (PF)
0947-0955	Reserved
0956	Photograph Pete Seda with children
0957(A)	Email March 28, 2000, 3:25 p.m. Q to P@qf.org

0957(B) March 28, 2000 letter Pete Seda to Pastor

0958 Email May 23, 2000, 3:20 p.m. B to P

0959 Email October 22, 2000, 8:57 p.m. Kelly Bennett to Pete Seda Sedaghaty

0960 Email January 24, 2001, 12:13 a.m. P to Shalomrav@aol.com

0961 Email February 23, 2001, 1:56 p.m. Stan Way to P@qf.org

0962 Email May 11, 2001, 10:12 a.m. James Y. Horton to P@qf.org

0963 Email May 21, 2001, 2:22 p.m. Pam Long to P@qf.org

0964 Email May 22, 2001, 11:31 a.m. Peace House to Pete Seda et. al.

0965 Email July 02, 2001, 12:53 a.m. Pete Seda to BLJ\_maj@yahoo.com

0966 Photograph Class at Al Haramain **[replaced with a complete version]**

0967 Photograph class at tent

0968 Photograph multi-cultural fair

0969 Photograph Religion Class at tent

0970 Photograph presentation at church

0971 Email Jane Claussen to P at QF.org, January 2, 2002

0972(A) Email January 21, 2002, 1:50 pm, P to Florin

0972(B) Attachment letter for Peace House

0973	Bi-line article: Islamic Show Intrigues RCC, February 2002
0974	Email February 1, 2002, Drake, Tommy to P at QF.org, 10:47 am
0975	Email February 5, 2002, Closter, Larry to Q.
0976	Photograph Pete Seda In Church
0977	Photograph of Pete Seda lecturing to students
0978	Photograph Pete Seda in Rabbi Zaslow's Temple
0979-0986	Reserved
0987	Email April 11, 2000, 8:13 a.m. B to P@qf.org
0988	Email March 13, 2002, Stan Way to P
0989(A)	Email April 19, 2002, P to Florin
0989(B)	Attached letter to Senators and Reps
0990	Booklet Islam Is by Pete Seda
0991	Islamic T-Shirt
0992 - 1001	Reserved
1002	Pete Seda Video Statistics
1002(A)	Pete Seda Video compilation CD
1002(B)	Chechnya video compilation CD
1003	Summary of prisoner letters (to be created)
1004	Letter and Check \$300 November 15, 1999
1005	Check \$50 November 20, 1999
1006	Check \$100.00 November 20, 1999

- 1007 Check \$100.00 December 1, 1999
- 1008 Money order \$300 December 6, 1999
- 1009 Check \$400.00 December 20, 1999
- 1010 Check \$200.00 January 1, 2000
- 1011 Check and Envelope \$600.00 January 5, 2000
- 1012 Check \$150.00 January 19, 2000
- 1013 Check \$68.00 January 22, 2000
- 1014 Checks \$50,000.00, \$4,000.00, \$196.75 January 21, 2000
- 1015 Check and Deposit ticket February 23, 2000
- 1016 Check dated December 24, 1999, \$2,000.00
- 1017 - 1023 Reserved
- 1024 Photograph of Shrubbery
- 1025(A) Photograph of wire
- 1025(B) Photograph of wire
- 1026 Photograph of former President George W. Bush with Saudi Crown Prince Abdullah
- 1027 Copies of Receipt No. 418933 and Receipt No. 15881 written in Arabic
- 1028 Video report concerning activities of Al Haramain Medical Committee from 1999 (to be submitted under separate cover)
- 1028(A) 2 Minute Video Summary of 1028

- 1029 Patricia Florin document list
- 1030 Chase Bank deposit ticket dated March 25, 2000
- 1031 Chechnya donations
- 1032 - 1033 Reserved
- 1034 Photograph of interior of trailer searched
- 1035 - 1046 Reserved
- 1047 Photograph of interior of trailer searched, specifically depicting a box of "Pete's . . . tapes."
- 1048 -1053 Reserved
- 1054 Letter from Donald Stine, Chaplain, to Qu'ran Foundation, December 7, 1999
- 1055 Letter from Chaplain Denis K. Burrell to Alharamain Islamic Foundation, February 24, 2000
- 1056 Letter from Donald Stine, Chaplain, to Qu'ran Foundation, March 23, 2000
- 1057 Letter from Andrew Leatherman, Chaplain, to Al Haramain Foundation, July 19, 2000
- 1058 Email from Sgt. Vito D. Deure, U.S. Army Chaplain, to [haramain@alharamain.org](mailto:haramain@alharamain.org) July 27, 2000
- 1059 Letter from Robert Thomas, Chaplain, to Al Haramain Islamic Foundation, August 1, 2000
- 1060 Letter from James E. Penn, Chaplain, to Quran Foundation, August 15, 2000

- 1061 Letter from Rev. Steve Gadaire, Chaplain, to Al Haramain Foundation USA, August 16, 2000
- 1062 Letter from Mitch Anderson, Chaplain, to Al Haramain Foundation, February 21, 2001
- 1063 Letter from Joe T. Portugal, Chaplain, to Al Haramain Foundation, April 9, 2002
- 1064 Demonstrative Exhibit of QuickBooks Activity
- 1065 Springfield Building Schedule per Jeff Cone
- 1201 Email from WesternSom to [a@qf.org](mailto:a@qf.org), February 9, 1999 at 9:13 p.m.
- 1201(A) Urgent Appeal Kosova, April 2, 1999, faxed to Al Haramain on April 2, 1999
- 1201(B) Time Sheet of Mr. Gartenstein-Ross for April 1999
- 1201(E) "Give Five Minutes For Kosova," Kosova Task Force, USA, Justice for All
- 1201(F) Check written to Kosova Task Force, USA, dated April 2, 1999
- 1210 Email Exchange between Mr. Gartenstein-Ross and Soliman Al Buthe, May 4<sup>th</sup> and 5<sup>th</sup>, 1999
- 1215 Request for Assistance from the Uma Women Society, dated December 23, 1999
- 1216 Email exchange between Mr. Gartenstein-Ross and Soliman Al Buthe, March 5, 2000
- 1238 Excerpt of Wilcox Working Papers Presented During Testimony
- 1238(A) Check \$21,000 #9624



- 1238(B) Check \$131,300 #9456
- 1238(C) Check \$10,000 #9002
- 1238(D) Check \$318,291.74 #9733
- 1238(E) Reconciliation Report

Respectfully submitted on September 7, 2010.

/s/ Steven T. Wax

Steven T. Wax

Federal Public Defender

/s/ Lawrence H. Matasar

Lawrence H. Matasar